



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUL 27 2009

REPLY TO THE ATTENTION OF

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Marisol Simon  
Regional Administrator, Region 5  
Federal Transit Administration  
200 West Adams Street, Suite 2410  
Chicago, IL 60604

**Re: Comments on the Final Environmental Impact Statement for the  
Minneapolis-St. Paul, MN Central Corridor Project, CEQ No. 20090212**

Dear Ms. Simon:

In accordance with U.S. Environmental Protection Agency (US EPA) responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Final Environmental Impact Statement (FEIS) for the Minneapolis - St. Paul, Central Corridor Project, in Hennepin and Ramsey Counties, Minnesota.

US EPA has previously participated in early scoping for this project in June 2001, provided comments on an Alternatives Analysis and Draft Environmental Impact Statement (DEIS) on June 5, 2006, provided scoping comments for a Supplemental DEIS (S-DEIS) on March 18, 2008 and comments on the S-DEIS on August 27, 2008. We also have participated in two site visits in 2008 and 2009 and other meetings and conversations with project managers, Metropolitan Council (MC) staff, and various affected community groups. This FEIS describes and assesses a baseline no build alternative and a preferred alternative Light Rail Transit (LRT) construction.

The Central Corridor LRT is approximately an 11-mile line that would serve the Minneapolis and St. Paul downtown areas, as well as the University of Minnesota (U of M), several residential/commercial neighborhoods, including an extensive, diverse minority and low-income community along University Avenue, and the State Capitol complex. In downtown Minneapolis, it would integrate with the Hiawatha LRT, and in downtown St. Paul, it would connect at the proposed Union Depot Multimodal Transit Hub, establishing the core of a seamless regional transit system.

Our review of the Central Corridor Project proposal as previously presented in the DEIS and S-DEIS raised a number of concerns that have been resolved, including the following.

- ♦ We noted earlier air pollution modeling had used outdated methods. We commend MC for updating these analyses.
- ♦ The proposal for locating a rail car maintenance facility adjacent to the Union Station raised several impact concerns such as hazardous waste site issues, karst drainage and proximity to the Mississippi River, historic considerations, and traffic impacts to future transportation hub developments. We commend MC for relocating this maintenance facility to a brownfield site and thus avoiding the above impacts.
- ♦ We raised questions regarding alternative routes that had been dropped from consideration and others that had not been considered. We appreciate the explanations and reasoning for the selection process presented in the FEIS.
- ♦ Placing an LRT system on an existing arterial street will have traffic impacts. These impacts will include possible worsening of intersection Level of Service (LOS) on University Avenue and congestion created by diversion of traffic into adjoining neighborhoods. Pedestrian access and safety were also of concern at some station sites due to diverted traffic, and confusion from emergency vehicle access to the LRT. We commend the many modifications described in the FEIS to address these complex interactions, including relocation of station sites, intersection modifications, and redesign of ancillary traffic flow from and to the LRT streets.
- ♦ The DEIS and S-DEIS referred to unidentified impacts from yet to be located Traction Power Substations (TPSS). We appreciate the FEIS clarification of these TPSS locations and issues.
- ♦ Noise levels and vibration issues became of great concern at a number of important receptor sites. We commend the many studies, analyses and remedial commitments made to address these concerns.
- ♦ The issue of electromagnetic forces (EMF) became a concern due to research facilities at the U of M and a historic radio station along the LRT route. We commend the analysis and resolution of these site concerns.
- ♦ The S-DEIS only referred to some degree of reconstruction as necessary for the Washington Avenue bridge over the Mississippi River. We appreciate the FEIS presenting a clearer understanding of the extensive structural work to be done and commitment to maintaining the visual integrity of this significant community icon.
- ♦ We commend MC for its efforts in outreach to the minority and low-income community and the proposed resolutions of many concerns raised through these efforts. Particularly noteworthy are the enhancements for community connectedness and safety by increasing the number of traffic lights with pedestrian crossings, the developing of transportation system management mechanisms to facilitate traffic and LRT speed and reduce congestion, designs to redirected left turn traffic to and from cross street traffic, modification of the LRT barrier curb system, and a proposed addition of three stations in these communities, with commitment to providing at least the sub-infrastructure for these three stations.
- ♦ We commend the extensive efforts to address historic property impacts which were inevitable for such a core city project.

We recommend the Record of Decision (ROD) address the following issues.

**Hazardous Waste Sites**

Many hazardous waste sites have been identified in the project area, including those adjacent to the right-of-way (ROW), with potential to be directly impacted or disturbed due to project-induced development. We recommend the ROD define parameters for addressing such induced secondary impacts. For example, this project could provide incentives to encourage assessment, cleanup, and redevelopment of these transit oriented development (TOD) induced hazardous waste sites.

**STORMWATER RUNOFF**

Large portions of the project lie over bedrock structure that includes karst or has the potential for carrying pollutant laden water runoff quickly into the water table. We recommend the ROD clearly state what measures will be used for avoiding road spill and run-off risks at such sites, including best management practices (BMP) to be followed.

**ENVIRONMENTAL JUSTICE**


We recommend the ROD include specific plans for parking loss mitigation, completion of the three proposed additional stations, and continued discussions with the Rondo community about cumulative impacts regarding community cohesion and function.

**HISTORIC PRESERVATION**

Many historic properties and sites with potential for listing were identified. We recommend the ROD include commitments under the signed agreements with the State Historic Preservation Office. We also recommend the ROD identify issues that are still being negotiated and include plans to resolve them.

We appreciate the opportunity to review and comment on this FEIS for the Central Corridor Project. Should you have any questions regarding these comments, please feel free to contact me or my staff member Norm West, at 312-353-5692 or [west.norman@epa.gov](mailto:west.norman@epa.gov).

Sincerely,

  
for Kenneth A. Westlake, Supervisor  
NEPA Implementation

Office of Enforcement and Compliance Assurance

Cc: Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
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